

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

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VLADIMIR DOBROSMYLOV,

Plaintiff,

Civil Action No. 1:19-cv- 05122 (BMC)

AFFIDAVIT OF WILLIAM MAIER

v.

DESALES MEDIA GROUP, INC.,

Defendant.

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STATE OF NEW YORK)
):ss
COUNTY OF KINGS)

WILLIAM MAIER, being duly sworn, deposes and says:

1. I am the Chief Executive Officer of defendant DeSales Media Group, Inc. ("DeSales"). I am fully and personally familiar with the facts set forth herein.

2. I am respectfully submitting this Affidavit in support of DeSales' renewed motion for summary judgment in this case.

3. DeSales is a Catholic ministry that serves the Roman Catholic Diocese of Brooklyn ("Diocese of Brooklyn"), publishing news and information from a Catholic point of view.

4. DeSales is a direct provider of Catholic news, events and original content through print, TV, digital and experiential, to engage Catholics and try to drive them to put their faith in action. DeSales also is an agency that provides strategy, planning and execution of digital, creative, technology, educational, video, and event services to Catholic entities.

5. DeSales' mission is to use all forms of communication, media and technology to lead Catholics to a deeper faith in Jesus Christ, and to inspire and generate greater attendance, support and interaction in parishes, schools and Catholic organizations.

6. DeSales' greatest goal is to drive Catholics to put their faith in action, by serving the faithful directly through our news and media properties, and by serving the Church institutions that serve the faithful through our agency services and initiatives in marketing, communications, and technology.

7. DeSales is a 501(c)(3) non-profit organization. We are named for St. Francis de Sales, the patron saint of writers and journalists. We were founded in 2011. Our purpose from the outset was to address the core communications needs of the Catholic Church in Brooklyn and Queens: external communications, internal communications, and operations and data management. Today, we continue our mission. DeSales is unique in its reach of Catholics in Brooklyn and Queens. As such, it has few, if any, competitors, and no for-profit (commercial) competitors.

8. DeSales, has been, and continues to be, solely a religious non-profit organization. DeSales does not compete with commercial enterprises.


WILLIAM MAIER

Sworn to before me on this 25th
day of May, 2021


NOTARY PUBLIC

YADIRA HICIANO
Notary Public, State of New York
No. 01H16053473
Qualified in Nassau County
Commission Expires January 8, 2023